

1 Jason Sheasby SBN 205455
jsheasby@irell.com
2 IRELL & MANELLA
1800 Avenue of the Stars, Suite 900
3 Los Angeles, California 90067-4267
Telephone: (310) 277-1010
4 Facsimile: (310) 203-7199

5 Daniel P. Watkins (*pro hac vice*)
daniel.watkins@mwpp.com
6 Amy M. Roller (*pro hac vice*)
amccannroller@mwpp.com
7 MEIER WATKINS PHILLIPS PUSCH LLP
919 18th Street NW, Suite 650
8 Washington, DC 20006
Telephone: (202) 318-3655

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10 *Attorneys for Plaintiff Kytch, Inc.*

Catherin Y. Lui SBN 239648
clui@orrick.com
ORRICK, HERRINGTON & SUTCLIFFE LLP
405 Howard St,
San Francisco, CA 94105
Telephone: (415) 773-5700
Facsimile: (415) 773 5759

Kristopher R. Wood SBN 284727
kristopher.wood@orrick.com
Catherine L. Malone SBN 325283
cmalone@orrick.com
ORRICK, HERRINGTON & SUTCLIFFE LLP
2050 Main Street Ste. 1100
Irvine, CA 92614
2050 Main Street
Suite 1100
Irvine, CA 92614-8255
United States
Telephone: (949) 567 6700
Facsimile: (949) 567-6710

Attorneys for Defendant McDonald's Corp.

13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA
15 SAN FRANCISCO DIVISION

16
17 KYTCH, INC.,

18 Plaintiff,

19 v.

20 MCDONALD'S CORPORATION,

21 Defendant.

No. 23-CV-01998

22
23 **JOINT STIPULATION TO EXTEND CERTAIN PRE-TRIAL DEADLINES**
24 **AND CONTINUE TRIAL; ORDER THEREON**
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Plaintiff Kytch, Inc. (“Plaintiff”) and Defendant McDonald’s Corporation, by and through counsel of record (collectively “Parties”), hereby state as follows:

WHEREAS, on July 27, 2023, the Court issued a Case Management Order setting the close of fact discovery on April 15, 2024, and setting the jury trial in this matter for February 2, 2025;

WHEREAS, Defendants in a related case Kytch is prosecuting in the Superior Court for the State of California for the County of Alameda sought a continuance, and that trial was recently postponed until May 2024;

WHEREAS, this continuance has required Plaintiff to expend significant resources to prosecute the Alameda County action, and more time is needed to complete fact discovery and comply with the deadlines in this case;

WHEREAS, Parties met and conferred regarding a continuance and agreed to a six-month extension of time for all discovery, dispositive motion, pre-trial, and trial deadlines, other than the March 18, 2024 deadline to seek leave to amend pleadings;

NOW, THEREFORE, the Parties respectfully stipulate and agree, by and through their respective counsel of record, as follows:

STIPULATION

IT IS HEREBY STIPULATED that all deadlines in this case, other than the deadline to seek leave to amend pleadings, are continued by six months as set forth in the below table:

	Original Date	New Proposed Date
Deadline to Seek Leave to Amend Pleadings	3/18/2024	3/18/2024
Close of Fact Discovery	4/15/2024	10/15/2024
Rule 26 Expert Disclosures	5/6/2024	11/6/2024
Rule 26 Rebuttal Expert Disclosures	5/31/2024	12/9/2024
Close of Expert Discovery	7/3/2024	1/31/2025
Deadline to File Dispositive Motions	8/12/2024	2/14/2025
Deadline to File Dispositive Motion Opposition	9/6/2024	3/10/2025
Deadline to File Dispositive Motion Reply	9/23/2024	3/27/2025

1	Hearing on Dispositive Motions	10/17/2024	4/17/2025
2	Exchange of Pretrial Disclosures	11/25/2024	5/27/2025
3	Deadline to File Pretrial Documents	12/9/2024	6/9/2025
4	Deadline to File Oppositions to Motions in Limine	12/23/2024	6/27/2025
5	Pretrial Conference	1/16/2025	7/17/2025 7/16/2025
6	Final Pretrial Conference	2/13/2025	8/14/2025
7	Jury Trial (Duration to be determined)	2/24/2025	8/25/2025

9 **IT IS SO STIPULATED**, through Counsel of Record.

10 DATED: March 4, 2024

11 **FOR PLAINTIFF KYTCH, INC.**

12 /s/ Daniel P. Watkins

13 DANIEL P. WATKINS
14 MEIER WATKINS PHILLIPS PUSCH LLP
15 Attorney for Plaintiff Kytch, Inc.

16 **FOR DEFENDANT MCDONALD'S CORP.**

17 /s/ Catherine Y. Lui

18 CATHERINE Y. LUI
19 ORRICK HERRINGTON & SUTCLIFFE, LLP
20 Attorney for Defendant McDonald's Corp.

21 PURSUANT TO STIPULATION, IT IS SO ORDERED.

22 DATED: March 4, 2024

23 
24 THOMAS S. HIXSON
25 United States Magistrate Judge